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Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE  
(UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

-----X  
ROLENDIO CABRERA AND LUZ AVILA,

Plaintiffs,

-against-

**NOTICE OF  
ADOPTION**

**08 CIV 2256**

ON-SITE:

7 WORLD TRADE COMPANY, L.P.; A RUSSO  
WRECKING, INC.; ABM INDUSTRIES, INC.; ABM  
JANITORIAL NORTHEAST, INC.; AMEC  
CONSTRUCTION MANAGEMENT, INC.; AMEC  
EARTH & ENVIRONMENTAL, INC.; ANTHONY  
CORTESE SPECIALIZED HAULING LLC.; ATLANTIC  
HEYDT CORP.; BECHTEL ASSOCIATES  
PROFESSIONAL CORPORATION; BECHTEL  
CONSTRUCTION, INC.; BECHTEL CORPORATION;  
BECHTEL ENVIRONMENTAL, INC.; BERKEL &  
COMPANY, CONTRACTORS, INC.; BIG APPLE  
WRECKING & CONSTRUCTION CORP.; BOVIS LEND  
LEASE LMB, INC.; BREEZE CARTING CORP.;  
BREEZE NATIONAL INC.; BRER-FOUR  
TRANSPORTATION CORP.; BURO HAPPOLD  
CONSULTING ENGINEERS, P.C.; C.B.  
CONTRACTING CORP.; CANRON CONSTRUCTION  
CORP.; CORD CONTRACTING CO., INC.; DAKOTA  
DEMO-TECH; DIAMOND POINT EXCAVATING  
CORP.; DIEGO CONSTRUCTION, INC.; DIVERSIFIED  
CARTING, INC.; DMT ENTERPRISE, INC.;  
D'ONOFRIO GENERAL CONTRACTORS CORP.;  
EAGLE LEASING & INDUSTRIAL SUPPLY, INC.;

EAGLE ONE ROOFING CONTRACTORS INC.; EJ DAVIES, INC.; EN-TECH CORP.; EVERGREEN RECYCLING OF CORONA (EROC); EWELL W. FINLEY, P.C.; EXECUTIVE MEDICAL SERVICES, P.C.; FLEET TRUCKING, INC.; FRANCIS A LEE EXTERIOR RESTORATION, INC.; FTI TRUCKING, INC.; GILSANZ, MURRAY & STEFICEK, LLP, GOLDSTEIN ASSOCIATES CONSULTING ENGINEERS, PLLC.; HALLEN WELDING SERVICE, INC.; H.P. ENVIRONMENTAL; KOCH SKANSKA INC.; LAQUILA CONSTRUCTION INC.; LASTRADA GENERAL CONTRACTING CORP.; LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEERS P.C.; LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARTLETT, INC.; LUCIUS PITKIN, INC.; LZA TECH-DIV OF THORTON TOMASETTI; MANAFORT BROTHERS INCORPORATED; MAZZOCCHI WRECKING, INC.; HUDSON MERIDIAN CONSTRUCTION GROUP, LLC F/K/A MERIDIAN CONSTRUCTION CORP.; MORETRENCH AMERICAN CORP.; MRA ENGINEERING, PC; MUESER RUTLEDGE CONSULTING ENGINEERS, INC; NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & ENVIRONMENTAL CORP.; PLAZA CONSTRUCTION CORP.; PRO SAFETY SERVICES LLC.; PT & L CONTRACTING CORP.; ROBER SILMAN ASSOCIATES; ROBERT L. GEROA, INS.; RODAR ENTERPRISES, INC.; ROYAL GM, INC; SAB TRUCKING INC.; SAFEWAY ENVIRONMENTAL CORP.; SEASONS INDUSTRIAL CONTRACTING; SEMCOR HEGER INC.; SKIDMORE, OWING & MERRILL LLP; SURVIVAIR; TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION CORPORATION OF NEW YORK; TISHMAN INTERIORS CORPORATION; TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI GROUP, INC.; TORRETTA TRUCKING, INC.; TOTAL SAFETY CONSULTING, L.L.C.; TUCCI EQUIPMENT RENTAL CORP.; TULLY CONSTRUCTION CO., INC.; TURNER CONSTRUCTION COMPANY; ULTIMATE DEMOLITIONS/CS HAULING (JOINT VENTURE); VOLLMER ASSOCIATES LLP.; WEEKS MARINE, INC.; WEIDLINGER ASSOCIATES, CONSULTING ENGINEERS, P.C.; WHITNEY CONTRACTING INC.;



WOLKOW-BRAKER ROOFING CORP.; WORLD  
TRADE CENTER PROPERTIES LLC.; WSP CANTOR  
SEINUK; YANNUZZI & SONS, INC.; YONKERS  
CONTRACTING COMPANY, INC.; YORK HUNTER  
CONSTRUCTION, LLC; ZIEGENFUSS DRILLING,  
INC.,

OFF SITE:

233 BROADWAY OWNERS, LLC, 45 WALL STREET  
LLC, 50 TRINITY, LLC, 63 WALL STREET INC, 63  
WALL, INC., 88 GREENWICH LLC, 90 CHURCH  
STREET LIMITED PARTNERSHIP, AJ GOLDSTEIN &  
CO., ALAN KASMAN DBA KASCO, ALAN L.  
MERRIL, AMBIENT GROUP, INC., ANN TAYLOR  
STORES CORPORATION, BANKERS TRUST  
COMPANY, BATTERY PARK CITY AUTHORITY,  
BELFOR USA GROUP, INC., BETTY JEAN  
GRANQUIST, BLACK DIAMONDS LLC,  
BLACKMON-MOORING-STEAMATIC  
CATASTOPHE, INC. D/B/A BMS CAT, BOARD OF  
EDUCATION OF THE CITY OF NEW YORK,  
BOSTON PROPERTIES, INC., BROADWAY WEST  
STREET ASSOCIATES LIMITED PARTNERSHIP,  
BROOKFIELD FINANCIAL PROPERTIES, INC.,  
BROOKFIELD FINANCIAL PROPERTIES, LP,  
BROOKFIELD PARTNERS, LP, BROOKFIELD  
PROPERTIES CORPORATION, BROOKFIELD  
PROPERTIES HOLDINGS INC., BROWN BROTHERS  
HARRIMAN & CO., INC., BT PRIVATE CLIENTS  
CORP., CAROL GAYNOR TRUST, CAROL GAYNOR,  
AS TRUSTEE OF THE CAROL GAYNOR TRUST,  
CAROL MERRIL GAYNOR, DEPARTMENT OF  
BUSINESS SERVICES, DEUTSCHE BANK TRUST  
COMPANY, DEUTSCHE BANK TRUST COMPANY,  
AMERICAS, DEUTSCHE BANK TRUST  
CORPORATION, ENVIROTECH CLEAN AIR, INC.,  
FRED GOLDSTEIN, GPS ENVIRONMENTAL  
CONSULTANTS, INC., HARLAND GAYNOR, AS  
TRUSTEE UNDER A DECLARATION OF TRUST,  
HAROLD G. GOLDSTEIN, AS TRUSTEE UNDER A  
DECLARATION OF TRUST, HERMAN L. BLUM, AS  
TRUSTEE UNDER THE LAST WILL AND  
TESTAMENT OF LOUIS W. GOLDSTEIN,  
HIGHLAND DEVELOPMENT LLC, HILLMAN  
ENVIRONMENTAL GROUP, LLC., IDELL  
GOLDSTEIN, AS TRUSTEE UNDER DECLARATION  
OF TRUST, INDOOR ENVIRONMENTAL

TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., MANUFACTURERS HANOVER TRUST COMPANY, MARGARET G. WATERS, MARGUERITE K. LEWIS, AS TRUSTEE UNDER THE LAST WILL AND TESTAMENT OF LOUIS W. GOLDSTEIN, MATTHEW A. GELBIN, AS TRUSTEE OF THE GELBIN FAMILY, MERRILL LYNCH & CO, INC., NATALIE S. LEBOW, AS TRUSTEE OF THE JEREMIAH PHILIP LEBOW REVOCABLE TRUST, NATALIE S. LEBOW, AS TRUSTEE OF THE JERRY P. LEBOW FAMILY TRUST, NEW YORK CITY SCHOOL CONSTRUCTION AUTHORITY, NEW YORK UNIVERSITY, NOMURA HOLDING AMERICA, INC., NOMURA SECURITIES INTERNATIONAL, INC., ONE WALL STREET HOLDINGS, LLC., PAMELA BETH KLEIN, AS TRUSTEE OF THE PAMELA AND ROWAN KLEIN TRUST, ROWAN K. KLEIN, AS TRUSTEE OF THE PAMELA AND ROWAN KLEIN TRUST, RUTH G. LEBOW, SHIRLEY G. SHOCKLEY, AS TRUSTEE UNDER THE DECLARATION OF TRUST, STEEPLECHASE ACQUISITIONS LLC, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVICES, INC., SYLVIA R. GOLDSTEIN, THAMES REALTY CO, THE BANK OF NEW YORK, THE BANK OF NEW YORK COMPANY, INC, THE BANK OF NEW YORK TRUST COMPANY NA, TISHMAN INTERIORS CORPORATION, TISHMAN SPEYER PROPERTIES, TOSCORP INC., TRIBECA LANDING L.L.C., TULLY CONSTRUCTION CO., INC., TULLY INDUSTRIES, INC, V CUCINIELLO, VERIZON NEW YORK, INC., WARWICK & CO., WESTON SOLUTIONS, INC., WFP TOWER B CO. G.P. CORP., WFP TOWER B HOLDING CO., LP, WFP TOWER B. CO., L.P., WFP TOWER D CO. G.P. CORP., WFP TOWER D HOLDING CO. I L.P., WFP TOWER D HOLDING CO. II L.P., WFP TOWER D HOLDING I G.P. CORP., AND WFP TOWER D. CO., L.P., ET AL.,

Defendants.

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PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a  
STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES,

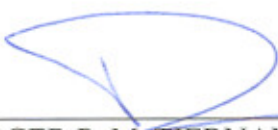


INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
July 21, 2008



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BARRY, McTIERNAN & MOORE  
Attorneys for Defendants  
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